



GETWELL HEALTH SYSTEMS, INC.

ANTI-CORRUPTION POLICY

I. Introduction

This Anti-Bribery and Anti-Corruption Policy (the "Policy") sets the general policies for the Corporation's full compliance with all applicable anti-corruption laws, for the purpose of protecting its customers and the integrity and trustworthiness of the Corporation.

II. Definitions

1. A *Bribe* is any form of incentive, reward or payment that is offered, promised, authorized, requested, provided or received for the improper performance of a person's function, duty or authority in order to gain any commercial, contractual, regulatory or personal advantage.
2. *Bribery* is the act of offering, promising, paying, authorizing or accepting any incentive, reward or payment for their, or another's personal gain with the intention to encourage the performance or non-performance of a duty or function.
3. *Corruption* is the state or situation resulting from Bribery. It also means the abuse of entrusted power or authority for personal gain.
4. A *Public Official* is any official or employee of the government, its agencies or instrumentalities.

III. Guidelines

1. The Corporation shall adopt measures that ensure compliance by the Corporation, its directors, officers and employees with all applicable anti-corruption laws, rules and regulations, including but not limited to, Republic Act No. 3019 (Anti-Graft and Corrupt Practices Act). All directors, officers and employees of the Corporation must be familiar with and, at all times, act in compliance with this Policy, and the said anti-corruption laws, rules and regulations.
2. This Policy shall apply to all activities and operations of the Corporation, and in the performance of any act in relation to the duties and functions of the directors, officers and employees of the Corporation. It is the responsibility of all directors, officers and employees to read, understand and comply with the Policy, which they must strictly observe.
3. This Policy should be read in conjunction with the Corporation's Core Values, Manual on Corporate Governance, Code of Business Conduct and Ethics, Conflict of Interest policies and associated policies of the Corporation.
4. Anybody who knowingly aids, abets or conceals or otherwise deliberately permits the commission of any irregular, illegal or fraudulent act shall be considered as guilty

as the principal perpetrators of the fraud, illegal act or irregularity. All employees of the Corporation have a duty to cooperate with investigations initiated under this policy.

5. This policy not only prohibits corruption involving personnel of the Corporation, but also involvement by way of third parties committing corruption on the Corporation's behalf. Corruption shall likewise not be tolerated from business partners or any other person or entity with a business relationship with the Corporation.
6. Both active and passive corruption will not be tolerated by the Corporation, such that the provider and the receiver of the incentive, reward or payment can be held responsible. This Policy also covers aiding and abetting others that commit corruption, or willfully ignoring clear evidence of corruption.

IV. Roles and Responsibilities

1. Board of Directors - The Board of Directors shall approve and adhere to this Policy. It shall likewise ensure that an effective system of internal control and risk management is established for the management of all business risks, including corruption. The Board shall ensure that there is periodic assessment of corruption risks as part of the implementation of this Policy and effective monitoring thereof.
2. Management - The Human Resources Department shall have oversight responsibility for the implementation of the Policy. Updates and material issue reporting shall be made to the Audit, Risk Management, Corporate Governance or appropriate committee as may be designated by the Board.
3. The Heads of each the respective Departments shall have primary responsibility for achieving compliance with the established requirements of this policy.

V. Training and Awareness

Anti-corruption general training shall form part of mandatory training for all employees. This Policy will also be communicated to all directors, officers and employees. The policy shall be posted on the company website.

VI. Compliance Monitoring

1. The Human Resources Department shall continuously assess the effectiveness of the Policy.
2. The Compliance Office and Internal Audit shall also monitor and conduct periodic evaluations of the Policy.

V. Review and Update of Policy

This policy shall be reviewed and, if necessary, updated at least annually.